REMARKS

Claim 1 calls for automatically closing packet data service application software if a mobility management state is idle. Nothing in any of the cited references even talks about an idle mobility management state. Cited are paragraphs 17, 25, claim 1, and the abstract.

Certainly, paragraph 17 does mention mobility management operations. It explains that mobility management operations are used to keep record of the location and connection status with mobile stations in the area. But there is no discussion of closing a packet data service application if the mobility management state is idle. In fact, there is no discussion of mobility management state in paragraph 17 or anywhere else within the application.

Therefore, reconsideration of the rejection of claims 1, 5, and 9 are respectfully requested.

Respectfully submitted,

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